

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-1(b)

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*Counsel to the Chapter 7 Trustee of the
Bankruptcy Estate of Zayat Stables, LLC*

In re:

AHMED A. ZAYAT,

Debtor.



Order Filed on September 8, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Case No.: 20-20387 (VFP)

Chapter 7

**STIPULATION AND CONSENT ORDER FURTHER EXTENDING TIME TO FILE A
COMPLAINT OBJECTING TO THE DISCHARGEABILITY OF ANY ALLEGED
DEBT DUE TO ZAYAT STABLES, LLC**

The relief set forth on the following pages, number two (2) through three (3), is hereby
ORDERED.

DATED: September 8, 2021

A handwritten signature in black ink, appearing to read "Vincent F. Papalia".

Honorable Vincent F. Papalia
United States Bankruptcy Judge

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Debtor: AHMED A. ZAYAT
Case No.: 20-20387 (VFP)
Caption of Order: STIPULATION AND CONSENT ORDER FURTHER EXTENDING TIME TO FILE A
COMPLAINT OBJECTING TO THE DISCHARGEABILITY OF THE ALLEGED DEBT
DUE TO ZAYAT STABLES, LLC

THIS STIPULATION AND CONSENT ORDER (the “Stipulation”), is made and entered into by and between by Jeffrey T. Testa, Esq., the Chapter 7 Trustee of the Bankruptcy Estate of Zayat Stables, LLC (the “Zayat Stables Trustee”) and Ahmed A. Zayat (the “Debtor,” collectively with the Zayat Stables Trustee, the “Parties”), by and through their counsel.

WHEREAS, on September 8, 2020, the Debtor filed a voluntary Chapter 7 petition for Bankruptcy.

WHEREAS, on December 4, 2020, the Zayat Stables Trustee filed a Motion to Extend Time to File a Complaint Objecting to the dischargeability of an alleged debt due to Zayat Stables, LLC pursuant to 11 U.S.C. § 523.

WHEREAS, on February 15, 2021, the Court entered an Order extending the time for the Zayat Stables Trustee to file a complaint objecting to the dischargeability of any debt due Zayat Stables, LLC until March 1, 2021.

WHEREAS, on March 5, 2021, the Court entered a Stipulation and Consent Order extending the time for the Zayat Stables Trustee to file a complaint objecting to the dischargeability of any debt due Zayat Stables, LLC until April 1, 2021.

WHEREAS, on March 31, 2021, the Court entered a Stipulation and Consent Order extending the time for the Zayat Stables Trustee to file a complaint objecting to the dischargeability of any debt due Zayat Stables, LLC until April 30, 2021.

WHEREAS, on May 7, 2021, the Court entered a Stipulation and Consent Order extending the time for the Zayat Stables Trustee to file a complaint objecting to the dischargeability of any debt due Zayat Stables, LLC until May 31, 2021.

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Debtor: AHMED A. ZAYAT
Case No.: 20-20387 (VFP)
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DUE TO ZAYAT STABLES, LLC

WHEREAS, on June 4, 2021, the Court entered a Stipulation and Consent Order extending the time for the Zayat Stables Trustee to file a complaint objecting to the dischargeability of any debt due Zayat Stables, LLC until June 30, 2021.

WHEREAS, on June 30, 2021, the Court entered a Stipulation and Consent Order extending the time for the Zayat Stables Trustee to file a complaint objecting to the dischargeability of any debt due Zayat Stables, LLC until July 31, 2021.

WHEREAS, on July 30, 2021, the Court entered a Stipulation and Consent Order extending the time for the Zayat Stables Trustee to file a complaint objecting to the dischargeability of any debt due Zayat Stables, LLC until August 31, 2021.

WHEREAS, the Parties, through counsel, have conferred and agreed that a further extension is in their mutual best interests.

NOW, THEREFORE, in consideration of the foregoing and subject to the approval of this Court, the Parties hereby stipulate and agree as follows:

1. The Zayat Stables Trustee's time to file a complaint objecting to the dischargeability pursuant to 11 U.S.C. § 523 of any debt allegedly due by the Debtor to Zayat Stables, LLC be and the same hereby is extended until and including September 30, 2021, without prejudice to the Zayat Stables Trustee's right to seek further extensions of time to object to the dischargeability of any such debt, and without prejudice to the Debtor's right to object to such applications; and
2. That a copy of this Order shall be served upon the Debtor and all parties in interest.

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DUE TO ZAYAT STABLES, LLC

STIPULATED TO, CONSENTED TO, AND AGREED BY:

McCarter & English, LLP

Rabinowitz, Lubetkin & Tully, LLC

By: /s/ Clement J. Farley
Clement J. Farley

By: /s/ Jay Lubetkin
Jay Lubetkin

Dated: August 25, 2021

Dated: August 25, 2021

*Counsel to the Chapter 7 Trustee of
the Bankruptcy Estate of Zayat Stables, LLC*

Counsel to Ahmed A. Zayat

In re:
Ahmed A. Zayat
Debtor

Case No. 20-20387-VFP
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0312-2
Date Rcvd: Sep 08, 2021

User: admin
Form ID: pdf903

Page 1 of 3
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 10, 2021:

Recip ID	Recipient Name and Address
db	+ Ahmed A. Zayat, 598 Warwick Avenue, Teaneck, NJ 07666-2927

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 10, 2021

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 8, 2021 at the address(es) listed below:

Name	Email Address
Andrew J Mollica	on behalf of Creditor RUDY RODRIGUEZ RACING STABLE INC. jdmol@aol.com
Anthony Sodono, III	on behalf of Mediator Anthony Sodono III asodono@msbnj.com
Arthur Joseph Monaco	on behalf of Plaintiff MGG Investment Group LP ajmonaco@obrienllp.com
Arthur Joseph Monaco	on behalf of Plaintiff MGG Specialty Finance Fund LP ajmonaco@obrienllp.com
Arthur Joseph Monaco	on behalf of Creditor MGG Investment Group LP ajmonaco@obrienllp.com
Arthur Joseph Monaco	on behalf of Plaintiff MGG SF Evergreen Fund LP ajmonaco@obrienllp.com

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Barry J. Roy	on behalf of Defendant Ahmed A. Zayat broy@rltlawfirm.com
Barry J. Roy	on behalf of Debtor Ahmed A. Zayat broy@rltlawfirm.com
Brian W. Hofmeister	on behalf of Plaintiff Donald V Biase bwh@hofmeisterfirm.com j119@ecfcbis.com
Brian W. Hofmeister	on behalf of Trustee Donald V. Biase bwh@hofmeisterfirm.com j119@ecfcbis.com
Clement J Farley	on behalf of Interested Party Jeffrey Thomas Testa cfarley@mccarter.com
Clement J Farley	on behalf of Interested Party Jeffrey T. Testa cfarley@mccarter.com
Donald V. Biase	dbiase4236@gmail.com dbiase@iq7technology.com;dbiase4236@gmail.com;pbellina@outlook.com;ecf.alert+Biase@titlexi.com
Franklin Barbosa, Jr	on behalf of Interested Party Jeffrey T. Testa fbarbosa@mccarter.com
Franklin Barbosa, Jr	on behalf of Interested Party Jeffrey Thomas Testa fbarbosa@mccarter.com
Henry M. Karwowski	on behalf of Defendant Ahmed A. Zayat hkarwowski@rltlawfirm.com
Jay L. Lubetkin	on behalf of Debtor Ahmed A. Zayat jlubetkin@rltlawfirm.com rgaydos@rltlawfirm.com
Jay L. Lubetkin	on behalf of Defendant Ahmed A. Zayat jlubetkin@rltlawfirm.com rgaydos@rltlawfirm.com
Jay L. Lubetkin	on behalf of Attorney Rabinowitz Lubetkin & Tully, LLC jlubetkin@rltlawfirm.com, rgaydos@rltlawfirm.com
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John Reklaitis	on behalf of Creditor MGG Investment Group LP jreklaitis@obrienllp.com
John J. Harmon	on behalf of Debtor Ahmed A. Zayat jharmon@rltlawfirm.com johnharmon42@gmail.com;rgaydos@rltlawfirm.com
Jonathan C. Schwalb	on behalf of Creditor Fay Servicing LLC as servicer for GC Asset Trust 2019-RPL1 bankruptcy@friedmanvartolo.com
Joseph A. Caneco	on behalf of Trustee Donald V. Biase jcaneco@foxrothschild.com
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Joseph M. Vann	on behalf of Interested Party Benjamin Zayat jvann@ctswlaw.com
Joseph M. Vann	on behalf of Interested Party Joanne Zayat jvann@ctswlaw.com
Joseph M. Vann	on behalf of Interested Party JPZ Holdings LLC jvann@ctswlaw.com
Joseph M. Vann	on behalf of Interested Party Justin Zayat jvann@ctswlaw.com
Joseph M. Vann	

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Total Noticed: 1

on behalf of Defendant Cohen Tauber Spievack & Wagener PC jvann@ctswlaw.com

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Paul S. Hollander

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Paul S. Hollander

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U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 45